



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 21, 2020

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

The Honorable Bernard Sanders
United States Senate
Washington, D.C. 20510

Dear Senator Sanders:

Thank you for the letter of December 3, 2019, to the U.S. Environmental Protection Agency (EPA) regarding pyrethroids.

As the letter mentions, the Food Quality Protection Act (FQPA) requires the EPA to consider the unique susceptibility of infants and children by applying an additional default safety factor when reviewing the safety of pesticides. The law also allows the EPA to adjust this safety factor if the Agency has reliable data showing that a revised safety factor would still be protective of the health of infants and children.

In 2009, the EPA identified uncertainty regarding the susceptibility of infants and children to pyrethroids and pyrethrins that required additional study. As a result, the EPA requested that the pesticide manufacturers conduct experiments and modeling to address those concerns. The CAPHRA program (consortium of pyrethroid registrants) responded to EPA's request by constructing mathematical models (known as physiologically based pharmacokinetic models) using rat and human tissues. These models were recommended by federal advisory groups and the National Academy of Sciences as a scientifically sound way to assess differences between children and adults. Also, after submission to the EPA, the developed models and results underwent rigorous review by a Science Advisory Panel in 2015 and an expert peer-review panel in 2018. The new toxicity data developed by the registrants provided strong scientific evidence that infants and children are not more susceptible to the neurotoxic effects of pyrethroids than adults. That means that the FQPA safety factor can be reduced from 3X to 1X while still being fully protective of infants, children and adults.

The toxicology and exposure potential of pyrethroids and pyrethrins have been heavily studied by the scientific community for decades. The EPA's human health risk assessment utilizes these available data.

In November 2019, the EPA published the white paper that explains the EPA's 2019 re-evaluation of the FQPA safety factor at www.regulations.gov under docket # EPA-HQ-OPP-2008-0331. The public comment period ended on January 13, 2020.

More information about the pyrethroid FQPA safety factor is available on our website. Information about the regulatory history of the evaluation of the FQPA safety factor for pyrethrins and pyrethroids can be found at www.epa.gov/ingredients-used-pesticide-products/evaluation-fqpa-safety-factor-pyrethrins-and-pyrethroids. Additional information about the 2019 re-evaluation of the FQPA safety factor for pyrethroids can be found at www.epa.gov/ingredients-used-pesticide-products/2019-

evaluation-fqpa-safety-factor-pyrethroids.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Sven-Erik Kaiser in the EPA's Office of Congressional and Intergovernmental Relations at kaiser.sven-erik@epa.gov or at (202) 566-2753.

Sincerely,

Alexandra Dapolito Dunn, Esq.
Assistant Administrator